

March 10, 2023

Electronic Delivery

Honorable Rick Lopes and Joseph P. Gresko, Co-Chairs, and
Member, Joint Committee on the Environment
General Assembly,
State of Connecticut
Legislative Office Building, Room 3200
Hartford, Connecticut 06106

In re: S. 6814, relating to: labeling, marketing, and advertising for recycling

Dear Co-Chairs Lopes and Gresko and Members,

On behalf of the members of the Plastics Division of the American Chemistry Council (ACC), thank you for this opportunity to provide comments to S. 6814, relating to: labeling, marketing, and advertising for recycling. ACC does **not** support this legislation in its current form.

ACC and our members are working hard to create a more circular economy for plastics and end used plastic in the environment. That is why ACC and its Plastics Division members were among the first to establish ambitious, forward-thinking goals that all plastic packaging in the United States is reused, recycled, or recovered by 2040 and that all U.S. plastic packaging is recyclable or recoverable by 2030.¹

This proposal does two things: establish a state specific plastics labeling scheme and establish a grant program to incent plastics deselection. Certain recyclable or compostable plastic items must be labeled with an “R” or “C,” non-recyclable or non-compostable items must include an interdictory circle. Additionally, this proposal directs the energy and environmental protection commissioner to develop a grant program with a private foundation to encourage the deselection of plastics – including using funds designated to increasing recycling. ACC opposes this legislation for two reasons.

Creates a state-specific label. This proposed labeling standard will be very difficult for manufacturers to comply with, if not impossible. These standards will cause conflict across jurisdictions since these manufacturers do not exclusively distribute in Connecticut. There may be inherent conflicts with how the labeling restrictions can coexist with future initiatives on extended producer responsibility, recycled content, and other packaging policy initiatives.

This proposal will increase landfilled waste. According to the EPA, plastics made up 12.2 percent of waste in 2018. Plastics have generally replaced other containers and

¹ Plastics Division, “U.S. Plastics Resin Producers Set Circular Economy Goals to Recycle or Recover 100% of Plastic Packaging by 2040,” Media release (American Chemistry Council, May 9, 2018), <https://www.americanchemistry.com/chemistry-in-america/news-trends/press-release/2018/us-plastics-resin-producers-set-circular-economy-goals-to-recycle-or-recover-100-of-plastic-packaging-by-2040>.

packaging materials. Compared to these materials, plastic containers and packaging tend to use significantly less material.² On average, over four times more alternative material is needed to perform the same function.³ This means that if plastic containers and packaging are replaced by common material alternatives, it will likely lead to increased landfilling, not less.

ACC encourages Connecticut to consider transitioning the state to a more circular economy. That is why ACC and its Plastics Division members have come together in support of our “5 Actions for Sustainable Change.”⁴ A part of those actions includes creating a modern regulatory system that includes a national approach to (1) creating clear and transparent labeling and (2) studying the impact of greenhouse gas emissions from all materials to guide informed public policy.

Again, we urge the committee not to support S. 6814 in its present form. Thank you again for this opportunity to provide this information to the committee. If you have any questions or if I may be of further service, please feel free to contact Margaret Gorman, ACC’s Senior Director, Northeast Region at (518) 432-7835 or

Margaret_Gorman@AmericanChemistry.com

Sincerely,



Adam S. Peer, Senior Director
American Chemistry Council

² Demetra A. Tsiamis, Melissa Torres, and Marco J. Castaldi, “Role of Plastics in Decoupling Municipal Solid Waste and Economic Growth in the U.S.,” *Waste Management* 77 (July 2018): 147–55, <https://doi.org/10.1016/j.wasman.2018.05.003>.

³ Richard Lord, “Plastics and Sustainability: A Valuation of Environmental Benefits, Costs, and Opportunities for Continuous Improvement” (American Chemistry Council, July 2016), <https://perma.cc/6PX6-MPUW>, <https://www.plasticpackagingfacts.org/wp-content/uploads/2016/11/ACC-report-July-2016.pdf>.

⁴ “5 Actions for Sustainable Change,” Industry report (Washington, D.C.: American Chemistry Council, 2021), <https://www.plasticmakers.org/files/d6b3a34b9a88b1a6ee4da0a73b24562d740f80e4.pdf>.